

# **EXHIBIT I.2**

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UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

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IN RE: NATIONAL PRESCRIPTION ) Case No.  
OPIATE LITIGATION ) 1:17-MD-2804  
APPLIES TO ALL CASES ) Hon. Dan A. Polster  
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VIDEOTAPED DEPOSITION OF GARY L. BOGGS

WASHINGTON, D.C.

THURSDAY, JANUARY 17, 2019

9:07 A.M.

Pages: 1 - 429  
Reported by: Leslie A. Todd

1     many orders McKesson gets of unusual size, pattern  
2     or frequency in a given month?

3                     MR. RAFFERTY:   Objection.

4                     THE WITNESS:   Probably thousands.

5     BY MR. STANNER:

6             Q     Mr. Boggs, I'll rephrase.

7                     Mr. Boggs, do you know how many  
8     suspicious orders McKesson reports to the DEA in a  
9     typical month?

10                    MR. RAFFERTY:   Objection.

11                    THE WITNESS:   Thousands.

12     BY MR. STANNER:

13             Q     So does that mean that the customers who  
14     place those suspicious orders are suspicious  
15     customers?

16             A     Absolutely not.

17             Q     If a customer places a suspicious order,  
18     does that mean the order is probably for some  
19     illegal purpose?

20             A     Without knowing more about the customer  
21     or more information, absolutely not.

22             Q     If a customer places a suspicious order,  
23     does that mean that order is likely to be  
24     diverted?

1 would prioritize profits over following the law?

2 A I have not.

3 Q In your time at McKesson, have you ever  
4 suggested terminating a customer and had the  
5 company push back on that?

6 A I have not. They -- I have unilateral  
7 authority to terminate a customer regardless of  
8 any financial gain or loss to the company or  
9 financial gain or loss to the -- to the customer.  
10 And since I've been at McKesson, our program has  
11 probably stopped shipping to 250-some-odd  
12 customers.

13 Q You -- you were asked some questions  
14 earlier about McKesson's algorithm. How long did  
15 it take to develop McKesson's current algorithm  
16 for thresholds?

17 A Taken --

18 MR. RAFFERTY: Objection.

19 THE WITNESS: It's taken years.

20 BY MR. STANNER:

21 Q Can you be more specific?

22 A We've -- I believe it was probably  
23 sometime in either late 2014 or early 2015, or  
24 whatever, when we engaged the Analysis Group, an